

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS – AUSTIN DIVISION

JEREMY STORY,

Plaintiffs,

V.

SUPERINTENDENT HAFEDH AZAIEZ, TRUSTEES AMBER FELLER, TIFFANIE HARRISON, AMY WEIR, JUN XIAO, CORY VESSA; OFFICERS JEFFREY YARBROUGH, JAMES WILLIBY, DEBORAH GRIFFITH, MILTON POPE, FRANK PONTILLO, RON COLE, CHIEF DENNIS WEINER, and CARLA AMACHER, individually, and ROUND ROCK INDEP. SCHOOL DISTRICT,

Defendants.

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CIVIL ACTION NO.
1:22-cv-00448-DAE

**JOINT MOTION TO EXTEND
DISPOSITIVE MOTION DEADLINE**

Plaintiff Jeremy Story and the Round Rock ISD Defendants (together, the “Parties”) jointly move the Court to extend the dispositive motion deadline. Currently, the dispositive motion deadline is July 31, 2025. The Parties seek an approximate one month extension until September 2, 2025.

On March 31, 2025, Plaintiff filed a notice designating Stephen Casey as lead counsel in his case. Since that time, Mr. Casey has been familiarizing himself with the case and the status of discovery. While Mr. Casey has adhered to all requirements of the Court's prior Order on the Round Rock ISD Defendants' Motion to Compel, Dkt. 112, the Round Rock ISD Defendants propounded additional discovery, including requests for production, for which responses were initially due on June 16, 2025. The Round Rock ISD Defendants agreed to several requested extensions of the deadline, with a final agreed date of June 30, 2025. This extension would still allow the Round Rock ISD Defendants 30 days to receive and review responses and responsive information and documents before the dispositive motion deadline.

Unfortunately, on the June 30, 2025 agreed deadline, Mr. Casey had a medical emergency and has, subsequently, had medical issues that have hindered his ability to provide responsive information. At the time of this Joint Motion, Plaintiff Jeremy Story has not served his responses to the Round Rock ISD Defendants' Second Request for Production or produced any responsive documents. The Second Requests for Production sought information regarding the specific claims and allegations Mr. Story asserts against the Round Rock ISD Defendants in this lawsuit. In addition, the Round Rock ISD Defendants believe there are additional recordings related to the events at issue in the lawsuit that still need to be produced.

Mr. Casey has not provided a date upon which Mr. Story's responses to the Second Request for Production and responsive documents will be provided. When conferring on this Joint Motion, Mr. Casey has informed counsel for the Round Rock ISD Defendants that he has recently (this weekend) added a new second-chair counsel to represent Mr. Story in this lawsuit. To enable Mr. Story additional time to respond to the outstanding written discovery requests and produce responsive documents—and allow the Round Rock ISD Defendants the ability to receive and review the responsive information before filing dispositive motions and not face any undue prejudice or surprise resulting from the delay caused by Mr. Casey's medical issues—the Parties seek a one-month extension to extend the dispositive motion deadline from July 31, 2025, until September 2, 2025.

In addition, on May 16, 2025, Mr. Story served a set of interrogatories and requests for production on each of the thirteen (13) individual Round Rock ISD Defendants. Responding to thirteen (13) separate sets of written discovery as well as gathering responsive information took substantial attorney time between May 16, 2025, and mid-June 2025—far more than 125 hours. Coupled with numerous briefing and discovery deadlines in other state and federal court lawsuits, the substantial time required at the last minute for written discovery responses in this lawsuit limited

counsel's ability to prepare dispositive motions. Moreover, at this time, the Round Rock ISD Defendants are missing responsive information that is needed before filing a dispositive motion.

Under the Federal Rules of Civil Procedure, the Court has broad discretion to extend or modify existing scheduling order deadlines for good cause. *See* FED. R. CIV. P. 16(b)(4). Good cause exists to grant this Motion. The Round Rock ISD Defendants, through counsel, have worked diligently with Mr. Casey since his designation as Mr. Story's lead counsel to conduct depositions and propound and respond to remaining written discovery. The Round Rock ISD Defendants have also worked patiently and cooperatively as Mr. Casey gets up to speed on the case and with any delays caused by this transition and his recent medical issues. The Round Rock ISD Defendants continue to work with Mr. Casey as he adds new counsel and needs additional time to respond to written discovery requests and produce responsive information.

Extension of the dispositive motion deadline will ensure sufficient time for the Round Rock ISD Defendants to receive and review Mr. Story's responses to their Second Request for Production and responsive documents before having to file any dispositive motion. The extension of the dispositive motion deadline will ensure the Round Rock ISD Defendants will not be prejudiced by the delays related to Mr. Casey's transition into this case, his subsequent medical issues that have caused the delay, and his search for new second-chair counsel to assist him. This joint request will also not prejudice Mr. Story.

Therefore, the Parties jointly request, with good cause, an approximate one-month extension of the dispositive motion deadline from July 31, 2025, to September 2, 2025.

CONCLUSION

For the foregoing reasons, Plaintiff Jeremy Story and the Round Rock ISD Defendants respectfully request that this Court extend the dispositive motion filing deadline to September 2, 2025.

Respectfully submitted,

/s/ Kathryn E. Long

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that she conferred with Plaintiff Jeremy Story's counsel, Stephen Casey, via email on July 23, 2025 and again on July 28, 2025, regarding the relief requested in this Joint Motion. Mr. Casey indicates that Mr. Story joins in the Motion and in the request for the relief being sought.

/s/ Kathryn E. Long

KATHRYN E. LONG

CERTIFICATE OF SERVICE

The undersigned certifies that on July 28, 2025, a true and correct copy of this document has been served upon all parties via the Court's electronic filing system:

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/s/ Kathryn E. Long

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